

REMARKS

In the Final Office Action mailed on May 17, 2005, the Examiner rejected claims 1, 6, 26, 40, 58, and 62 under 35 U.S.C. § 112 as being indefinite; rejected claims 1, 6, 26, 40, 58, and 62 under 35 U.S.C. § 101 as being improper process claims; rejected claims 1-13, 17-21, 26-33, 37-47 and 51-55 under 35 U.S.C. § 103(a) as being unpatentable over White (White, VIT SeeChain Portal: An Information Portal for the Enterprise, Database Associates International, Inc. Version 2, August 1999) in view of PR Newswire (PR Newswire, VIT Announces Seechain Product Line – Five Supply Chain Performance Applications, PR Newswire, New York, 14 June 1999); and rejected claims 14-16, 22-25, 34-36, 48-50 and 56-65 under 35 U.S.C. § 103(a) as being unpatentable over White and PR Newswire in view of Flores et al. (U.S. Patent No. 5,630,069).

By the above amendment, Applicants propose amending independent claims 1, 6, 26, 40, 58, and 62 to clarify the claimed invention. Upon entry of the amendment, Claims 1-65 will remain pending. Applicants respectfully submit that no new matter has been added by these amendments. Further, based on the following reasoning, Applicants respectfully traverse those rejections and request allowance of the present application.

I. Examiner Interview of August 8, 2005

Applicants wish to thank Examiner Heck for allowing Applicants' representative to discuss the pending claims during a telephonic interview on August 8, 2005. During the

interview, Applicants' representative and the Examiner discussed the claim rejections. With respect to the issue of non-functional descriptive material, Applicants' representative directed the Examiner to the relevant sections of the M.P.E.P. Further, the Examiner was requested to reconsider the rejections based on the interview and reasoning discussed below.

II. The Rejection of Claims 1, 6, 26, 40, 58, and 62 Under 35 U.S.C. § 101 and § 112

With regard to the rejection under 35 U.S.C. § 101 and § 112, the Examiner asserts that claims 1, 6, 26, 40, 58, and 62 are indefinite because they “merely recite a use without any active, positive steps delimiting how the use is actually practiced.” (OA at 6). Further, the Examiner alleges that the claims result in an improper definition of a process because the claims recite a use, without setting forth any steps involved in the process.

Although Applicants disagree with the Examiner's position, Applicants have amended claims 1, 6, 26, 40, 58, and 62 to more clearly recite the claimed elements in the form of active, positive steps delimiting how the use is actually performed. Accordingly, Applicants respectfully request the Examiner to withdraw the rejections of claims 1, 6, 26, 40, 58, and 62 under 35 U.S.C. § 101 and § 112. Further, Applicants respectfully request the entry of the claim amendments because the changes only involve a change to the form of the claim elements and would not require any further search and/or consideration.

III. **The Rejection of Claims 1-13, 17-21, 26-33, 37-47 and 51-55 Under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claims 1-13, 17-21, 26-33, 37-47 and 51-55 because the Examiner has failed to establish a *prima facie* case of obviousness.

Claim 1 defines a method for assisting collaboration between participants in a business community (See preamble). As recited in claim 1, the method includes *inter alia* “providing on a display device coupled to a data processing system a business view depicting a plurality of interlocked polygons illustrating interactions between the participants, the polygons being positioned relative to each other to define the participants for the interaction.” The claimed collaboration method is neither disclosed nor suggested by the prior art, including the references cited by the Examiner.

Although White arguably teaches, at paragraph 24, a knowledge view interface and a hyperbolic tree interface for viewing and displaying business information, White is silent as to “a business view depicting a plurality of interlocked polygons illustrating interactions between the participants, the polygons being positioned relative to each other to define the participants for the interaction,” as recited in claim 1 (emphasis added). Even if Applicants agreed that the conclusions recited in the Office Action are true, which Applicants do not accept, the Office Action has still failed to show that the prior art discloses any shape illustrating interactions between the participants and being positioned relative to each other to define the participants.

Furthermore, PR NewsWire does not cure the deficiencies of White. That is, PR Newswire also fails to teach or suggest at least a “business view depicting a plurality of interlocked polygons illustrating interactions between the participants, the polygons

being positioned relative to each other to define the participants for the interaction,” as recited in claim 1. The Office Action relies on PR Newswire for its alleged teaching of “wherein the business view and the interaction view assist collaboration between the participants.” (OA at 8-9.) Applicants submit that PR Newswire does not teach or suggest a “business view depicting a plurality of interlocked polygons illustrating interactions between the participants, the polygons being positioned relative to each other to define the participants for the interaction,” as recited in claim 1.

For at least these reasons, White and PR Newswire, when considered alone or in any proper combination, fail to teach each and every recitation of claim 1. Accordingly, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn and the claim allowed.

Independent claims 6, 21, 26, 40, and 55 are believed to be allowable over White and PR Newswire for at least the same reason as set forth above with respect to claim 1. Applicants, therefore, request the Examiner to withdraw the rejection of claims 6, 21, 26, 40, and 55.

Claims 2-5, 7-13, 17-20, 27-33, 37-39, 41-47 and 51-54 depend from claims 1, 6, 26, and 40. As explained, claims 1, 6, 26, and 40 recite elements that are neither disclosed nor suggested by White and PR Newswire either alone or in a proper combination. Accordingly, claims 2-5, 7-13, 17-20, 27-33, 37-39, 41-47 and 51-54 are allowable over White and PR Newswire for at least the same reasons as claims 1, 6, 26, and 40. Applicants, therefore, respectfully request that the rejection of these claims under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

IV. The Rejection of Claims 14-16, 22-25, 34-36, 48-50 and 56-65 Under 35 U.S.C. § 103(a)

Claims 14-16, 22-23, 34-36, 48-50, and 56-57 depend from claims 6, 21, 26, 40, and 55, respectively. As explained, claims 6, 21, 26, and 40 recite elements that are neither disclosed nor suggested by White and PR Newswire. Accordingly, claims 14-16, 22-23, 34-36, 48-50 are allowable over White and PR Newswire for at least the same reasons as claims 6, 21, 26, and 40. Applicants, therefore, respectfully request that the rejection of these claims under 35 U.S.C. § 103(a) be withdrawn and the claims allowed. Moreover, Flores et al. does not cure the deficiencies of White and PR Newswire. As admitted in the Office Action mailed December 27, 2004, Flores et al. fails to disclose all of the elements of claims 6, 21, 26, and 40.

Claim 24 is directed to creating a collaboration between participants in a business scenario and recites a combination of features including “accepting, into a data processing system,” certain kinds of information and “creating a collaboration for sharing a portion of the information accepted.” Neither White nor PR Newswire teaches or suggests, either singly or in any proper combination, at least this combination of features. Furthermore, Flores et al. does not cure the deficiencies of White and PR Newswire. Certainly, the Examiner admits that Flores et al. is silent as to this feature. (OA mailed on December 7, 2004). Accordingly, Applicants submit that claim 24 is allowable over the cited references.

Independent claims 58 and 62 recite a combination of features including three views. For example, claim 58 recites a combination of feature including providing on a display device coupled to a data processing system, *a first view* showing the

participants, interactions between the participants, and defining the participants for the interactions; providing on the display device, using the data processing system, a *second view* showing a sequence of the interactions; and providing on the display device, using the data processing system, a *third view* showing a system topology used by each participant. Nothing in White, PR Newswire, or Flores et al. teaches or suggests at least these features.

The Examiner alleges that White teaches the claimed third view by disclosing “the ability to define meta data relationships with the BID, and the meta data interchange hub, enables an organization to document and track the complete flow of information from transactional processing systems to decision and collaborative processing systems.” (OA at 19). Further, the “Examiner interprets White to suggest information flow is understood down to the system level” Id. Even assuming that the Examiner’s characterization of White is accurate, the Examiner has failed to show a teaching of a view showing a system topology used by each participant. That is, a teaching of the ability to define meta data relationships, to document and track the complete flow of information, even if system level, is insufficient to meet a “*third view* showing a system topology used by each participant” (emphasis added). Neither PR Newswire or Flores et al. cure the deficiencies of White. Accordingly claim 58 and claim 62 (which recites similar features to claim 58) are also allowable over the cited references.

Claims 63-65 depend from claim 62. As explained, claim 62 recites elements that are neither disclosed nor suggested by White, PR Newswire, and Flores et al. Accordingly, claims 63-65 are allowable over White, PR Newswire, and Flores et al. for

at least the same reasons as claims 62. Applicants, therefore, respectfully request that the rejection of these claims under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

V. Conclusion

In view of the foregoing, Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of claims 1-65.

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1-65 in condition for allowance. Applicants submit that the proposed amendments to claims 1, 6, 26, 40, 58, and 62 do not raise any new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their claimed relationships were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

Please grant any extensions of time required to enter this response and charge
any additional required fees to our deposit account 06-0916.

Respectfully submitted,
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